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13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15 ANGEL PRODUCTIONS WORLDWIDE, INC.,
16 Plaintiff,
17
18 vs.
19 AIRSTAGE BY EFFECKT-TECHNIK, GMBH,
20 a Foreign Company,
21 Defendant.

Case No.: 2:18-cv-02333-JCM-BNW

**JOINT STIPULATED DISCOVERY PLAN
AND SCHEDULING ORDER**

22 Pursuant to Federal Rule of Civil Procedure 26(f) and Local Rule 26-1(e), Plaintiff Angel
23 Productions Worldwide, Inc. (hereinafter "Plaintiff") and Defendant Airstage by Effeckt-
24 Technik, GMBH (hereinafter "Defendants") submit their Stipulated Discovery Plan and
25 Proposed Scheduling Order.

26 **I. CONFERENCE OF COUNSEL**

27 Per the Court's order, the parties met and conferred on Tuesday April 30th, 2019
28 telephonically and exchanged emails thereafter. In these exchanges, Counsel for the parties
limited their disagreements to those contained herein.

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II. DISCOVERY PLAN

1. The following dates were set in the Court's April 25th, 2019 order:

- a. The parties shall meet and/or confer as required by Fed. R. Civ. P. 26(f) not later than May 9, 2019.
- b. Last date to complete discovery: August 23, 2019
- c. Last date to amend pleadings and add parties: May 23, 2019
- d. Last date to file interim status report: June 24, 2019
- e. Last date to disclose experts pursuant to Fed. R. Civ. P. 26(a)(2): June 24, 2019.
- f. Last date to disclose rebuttal experts: July 24, 2019
- g. Last date to file dispositive motions: September 23, 2019
- h. Last date to file joint pretrial order: October 23, 2019. In the event dispositive motions are filed, the date for filing the joint pretrial order shall be suspended until 30 days after a decision of the dispositive motions.

FRCP 26(f)(3) VIEWS AND PROPSALS

1. Initial Disclosures:

Shall be due two weeks from the filing of this discovery plan.

2. Subjects on Which Discovery Will be Needed, Whether Discovery Should be Limited or Conducted in Phases:

Discovery will be necessary regarding the claims and defenses raised in the parties' initial pleadings. The parties do not believe that discovery will need to be limited or conducted in phases.

**3. Issues Regarding the Disclosure, Discovery, or Preservation of Electronically
Stored Information, Including the Form or Forms in Which it Should be
Produced;**

None.

4. Issues Regarding Claims of Privilege or Protection of Pre-Trial Materials:

None.

**5. Changes That Should be Made in the Limitations on Discovery Imposed
Under These Rules or by Local Rule.**

None.

6. Orders That the Court Should Issue Under Rule 26(c) or Rule 16(b) and (c):

None.

DATED this 14th day of June 2019.

GREENBERG TRAURING, LLP

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DATED this 14th day of June 2019.

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IT IS SO ORDERED

DATED: June 18, 2019



BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE